



UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF VIRGINIA  
Newport News Division

BOBBY BLAND, DANIEL RAY CARTER,  
JR., DAVID W. DIXON, ROBERT W.  
McCOY, JOHN C. SANDHOFFER and  
DEBRA H. WOODWARD,

Plaintiffs,

v 4:11cv45

B. J. ROBERTS, individually,  
and in his official capacity as  
Sheriff of the City of Hampton,  
Virginia,

Defendant.

DEPOSITION UPON ORAL EXAMINATION OF

BOBBY BLAND

Taken on behalf of the Defendant

Newport News, Virginia

August 22, 2011

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INGRAM REPORTING  
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Virginia Beach, Virginia 23454  
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1 reappointed. Why do you believe you were not  
2 reappointed by the sheriff -- by Sheriff Roberts  
3 after the election in 2009?

4 A. Because I had -- I have always done  
5 an outstanding job with all the jobs that I came  
6 in contact with, so I had no reason to believe  
7 that I would not be appointed again because I  
8 had done all my EPRs suggested. I had above  
9 average performances. And I was never  
10 disciplined as you-- as I can recall. And so I  
11 -- I -- it was my understanding that I was doing  
12 a wonderful job there.

13 Q. So why do you believe you were not  
14 -- why were you not reappointed?

15 A. Why was I not reappointed? I often  
16 wonder why I was not reappointed. It was  
17 probably because in opposition that he maybe  
18 thought I was, you know, going to oppose him in  
19 some way is the only reason I can imagine that I  
20 was not reappointed.

21 Q. All right. So let me explore that.  
22 What do you mean by that? You said you were  
23 going to oppose him in some way. What do you  
24 mean by that?

25 A. Well, maybe he thought I was going

1 to go with the opposition. Not vote for him or  
2 vote for the opposition.

3 Q. And why would you say that? What  
4 makes you say that?

5 A. Well, probably because my  
6 supervisor, Ms. Davis, was probably working for  
7 the opposition, and in some way, I don't know  
8 what way, maybe I got connected there and --

9 Q. Okay. Well, were -- were you  
10 working for McAdams' (sic) campaign to run for  
11 sheriff in 2009?

12 A. I'm sorry?

13 Q. Were you working for McAdams'  
14 campaign in 2009 with --

15 A. Jim Adams?

16 Q. Jim Adams. Was Adams -- strike  
17 that.

18 Was Adams running against the  
19 sheriff in 2009?

20 A. Yes, he was.

21 Q. Okay. Were a supporter of Adams?

22 A. I wasn't support of anyone at that  
23 time, sir.

24 Q. Okay. Well, I'm trying to find  
25 out. You say you thought that the sheriff may

1 have thought that you were supporting his  
2 opposition. Why would he think that?

3 A. He had probably connected me by  
4 working -- by my being with Ms. Davis and Ms.  
5 Davis working for Sheriff Adams, that's the only  
6 reason I -- I can surmise that he would do that.

7 Q. Okay. So you think it's just  
8 because you worked for Ms. Davis? Okay.

9 A. (Witness nodded) Because I had no  
10 other -- no other connection.

11 Q. All right. Did you -- did you  
12 actively support Adams' candidacy for sheriff?

13 A. No, sir.

14 Q. Did you contribute any money to his  
15 campaign?

16 A. No, sir.

17 Q. Did you go to any campaign  
18 functions for him?

19 A. No, sir.

20 Q. Did you post any postings on the  
21 internet supporting him?

22 A. No, sir.

23 Q. Did you say anything derogatory  
24 about Sheriff Roberts during the -- before the  
25 campaign or during the campaign?

1 What speech did you make, what did you do that  
2 caused Sheriff Roberts to fire you?

3 MR. SHOEMAKER: Object to the form  
4 of the question. The question  
5 mischaracterizes the allegations in the  
6 lawsuit. Go ahead and answer to the best  
7 of your ability.

8 A. Okay.

9  
10 BY MR. ROSEN:

11 Q. Tell me.

12 A. I was not given an opportunity to  
13 come before him.

14 Q. Okay. All right. Did you make any  
15 speech opposing his candidacy for sheriff to  
16 anyone?

17 A. No, sir. I did not make any  
18 speech. Excuse me. When you say, "any speech".

19 Q. Any.

20 A. Can you explain that to me, sir?

21 Q. Sure. Did you say anything  
22 expressing your rights -- expressing your views,  
23 your political views, either for or against him  
24 or Mr. Adams during the election that you  
25 believe that Sheriff Roberts used to fire you?

1           A.       Of course, there were -- there was  
2 always would be talk, you know, between  
3 co-workers, okay. And -- but it was never --  
4 but it was never said, you know, who I would,  
5 you know, who I would vote for during that time  
6 frame.

7           Q.       So you didn't tell anyone?

8           A.       So I would just tell -- well, I  
9 would -- I would talk to my co-worker, maybe one  
10 that I trusted, and say, okay, you know, I don't  
11 know whether this is going to be a good time to  
12 make a change or whatever the case might be,  
13 but, you know, I would talk to my co-worker and  
14 say that but not, you know.

15          Q.       What does that mean? I don't  
16 understand what that means.

17          A.       You don't understand what what  
18 means?

19          Q.       I don't know what you just said,  
20 no. Okay. Let me ask you this. Who other  
21 co-workers did you talk to about your political  
22 views as to whether Sheriff Roberts should  
23 remain sheriff?

24          A.       My would talk to my closest  
25 co-worker who would be Debbie -- Debbie Woodard

1 -- Woodward.

2 Q. All right.

3 A. Yeah. She was next door to me,  
4 yes. We would always talk.

5 Q. All right. And so you would talk  
6 to her about whether Sheriff Roberts should stay  
7 sheriff or not?

8 A. We would always talk of, you know,  
9 if he was doing a good job, he would stay. If  
10 he's not doing a good job, maybe he should go,  
11 or something like that.

12 Q. Well, you don't believe that she  
13 reported that back to Sheriff Roberts, do you?

14 A. I have no knowledge of that, sir.

15 Q. Okay. Did you talk to anyone else  
16 besides Debbie Woodward -- Woodard about that?

17 A. No. She would be the only --  
18 probably the only one I would talk with.

19 Q. Okay. Did you ever talk with any  
20 of the sheriffs in administration about your  
21 political views?

22 A. No. I would never talk to anyone  
23 else about my political views.

24 Q. Because why? Because it --

25 A. It would get out.

1           A.       Excuse me?

2           Q.       Did they require -- did he require  
3 the employees to help him get elected --  
4 reelected?

5           A.       I'm -- I'm sure when he got  
6 everybody together, that was his focus was to  
7 get everybody to jump on his band wagon because  
8 he wanted to be, you know, reappointed. He  
9 wanted to be reelected to sheriff. So he was  
10 just making sure everybody was on the same page  
11 that, okay, I'm the best person, I'm the best  
12 candidate.

13          Q.       Well, other than saying that, did  
14 he ask you to vote for him?

15          A.       Well, he said he was the best  
16 candidate then. You know, you have to just read  
17 between the lines that, I'm the best candidate  
18 here, so.

19          Q.       Well, did he require that you  
20 contribute money to his campaign?

21          A.       I'm sure I contributed money to his  
22 campaign in the form of ticket sales, yes.

23          Q.       You say you are sure you did?

24          A.       I did contribute to his campaign.

25          Q.       How much did you contribute?



1           A.       Whatever tickets were. Usually, we  
2 got them in blocks. I think it was five, I  
3 think there were about ten, about \$50 for each  
4 campaign.

5           Q.       You mean raffle tickets?

6           A.       Yes, sir.

7           Q.       Okay. Were they required that you  
8 buy raffle tickets?

9           A.       Yes, sir.

10          Q.       Why do you say that? Did they say  
11 you have -- had to buy him?

12          A.       The official that gave us the  
13 tickets indicated that you sell them or either  
14 you purchase them.

15          Q.       Who -- who -- who -- who did that  
16 to you? Who - who told you that?

17          A.       That was the last couple -- person  
18 that gave me tickets were at that time was  
19 Captain Richardson, who would hand them out to  
20 me.

21          Q.       And did you buy \$50 worth of  
22 tickets in 2009?

23          A.       Yes, I did, sir.

24          Q.       Did you have -- did you buy them in  
25 cash or check?

1 Thursday.

2 MR. ROSEN: Well, I have it, but  
3 I'm -- but you will have it in advance of  
4 your depositions.

5 MR. SHOEMAKER: Okay. I've got no  
6 objection.

7 MR. ROSEN: Okay. All righty.  
8 Okay. Okay. For that, and if there's any  
9 other responses to interrogatories that I  
10 find out about also, I would like to have  
11 the opportunity to follow up if I need to.

12 MR. SHOEMAKER: No problem.

13  
14 BY MR. ROSEN:

15 Q. Okay. All right. And so do I  
16 understand that you bought \$50 worth of tickets  
17 every year -- every -- every election?

18 A. Yes. I believe I purchased tickets  
19 every year that -- that -- they were given to  
20 me.

21 Q. Okay. All right. Could you have  
22 said you don't want -- you couldn't do it this  
23 year? Could you have done that or not?

24 A. No. I never said I couldn't do it.

25 Q. Okay. All right. Did anyone tell

1 employment would not continue if you didn't do  
2 it, were you?

3 A. Oh no. I willingly did that.

4 Q. Okay. All right.

5 A. I had no problem with that.

6 Q. Did you work on his campaign in  
7 2009?

8 A. No, sir. I did not work on his  
9 campaign in 2009.

10 Q. Why not?

11 A. I just didn't work on his campaign.

12 Q. All right.

13 A. I didn't go out to hand out flyers,  
14 I think -- I think the night of the election, I  
15 did go out and help set up his equipment. I was  
16 called by Captain Wells-Major to set up the  
17 computer, the laptop to help show results that  
18 -- that were coming in. So that -- that, I  
19 think, was the only thing that I did for that  
20 campaign.

21 Q. Was that -- was that as a  
22 volunteer? Was that as part of your job at the  
23 Sheriff's Department?

24 A. No. That was not part of my job.

25 Q. Okay, okay.

1 Probably about ten to 15 percent that  
2 participated.

3 Q. So ten to 15 percent --

4 A. That would be an approximate guess,  
5 yes, sir.

6 Q. -- of the Sheriff's Department  
7 employees participated in the -- the political  
8 campaign.

9 A. That would help out with his  
10 campaign.

11 Q. Okay.

12 A. It might have been more than that.  
13 So I was -- I'm guessing at this time. Say  
14 approximately ten to 15 percent.

15 Q. Okay.

16 A. It could have been more.

17 Q. All right. And it's alleged in  
18 paragraph 15D that the sheriff had coerced  
19 employees to sell tickets and to buy tickets to  
20 campaign fund raising events.

21 Were you ever coerced to sell  
22 tickets or buy tickets?

23 A. I was not coerced. I was asked to  
24 either buy them or -- or you know --

25 Q. Sell them?